

# EXHIBIT 135

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

STATES OF NEW YORK,  
MASSACHUSETTS,  
WASHINGTON, COLORADO,  
CONNECTICUT, DELAWARE,  
DISTRICT OF COLUMBIA,  
HAWAII, ILLINOIS, IOWA, NEW  
MEXICO, NORTH CAROLINA,  
OREGON, PENNSYLVANIA,  
RHODE ISLAND, VERMONT, and  
VIRGINIA,

Plaintiffs,

v.

DONALD TRUMP, in his official  
capacity as President of the United  
States; U.S. DEPARTMENT OF  
HOMELAND SECURITY; ELAINE  
C. DUKE, in her official capacity; U.S.  
CITIZENSHIP AND IMMIGRATION  
SERVICES; U.S. IMMIGRATION  
AND CUSTOMS ENFORCEMENT;  
and the UNITED STATES OF  
AMERICA,

Defendants.

CIVIL ACTION NO. 1:17-cv-05228  
(NGG) (JO)

I, Melissa L. Rakes, hereby declare as follows:

1. I am the Associate Vice President for Academic Affairs at Delaware Technical Community College ("DTCC").

2. I have compiled the information in the statements set forth below through DTCC personnel who have assisted me in gathering this information from DTCC campuses and the central administrative office.

3. Delaware Technical Community College is a statewide multi-campus community college committed to providing affordable, open admission, post-secondary education that is relevant and responsive to labor market and community needs. The College offers comprehensive educational opportunities that contribute to the economic vitality of the State, including career, general, developmental, and transfer education; workforce development; and lifelong learning. The College respects its students as individuals and as members of diverse groups and is committed to fostering student success in higher education as a means to economic and personal advancement.

4. DTCC is Delaware's only community college. With four campuses located in each of Delaware's three counties and the City of Wilmington, DTCC serves over 30,000 Delawareans each year in our credit and workforce development programs, including DACA recipients.

5. Although DTCC collects limited information about citizenship and immigration status, we estimate there are at least 148 currently registered students who will be affected and 242 graduates (from 2012-2017).

6. The retraction of DACA is a major change that will affect many of our students and the community.

7. The most critical concern is the change to the employability of students and alumni.

8. Many of DTCC's students are non-traditional, meaning they are adult learners who must support themselves and their families while they attend college. The average age of our student is 27 years old, and the majority can only attend on a part-time basis due to their need to work to support themselves and/or their families. If they lose their ability to work, then they will most likely lose their ability to complete their education. In addition, this opportunity to work legally was a major motivator to graduate.

9. Students in programs that require employment authorization to complete elements of the program, such as internships, will be severely impacted by the loss of work authorization DACA provides.

10. Alumni who are working under their deferred action status may no longer be able to work if DACA is rescinded, thereby resulting in severe hardship for the graduates and for local employers who rely on the highly skilled workforce DTCC provides.

11. A student's ability to obtain financial aid or to qualify for a program of study that requires a criminal history background check will also be impacted if the DACA program is rescinded.

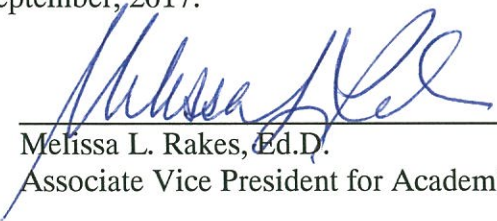
12. While DACA students are not eligible for federal financial aid, the inability to file a FASFA could preclude otherwise eligible students from being considered for private, third-party scholarships.

13. The identification number provided to an undocumented student who was granted DACA status could be used to perform a criminal history background check. Undocumented students desiring to enroll in a program that requires a criminal history background check may be precluded if DACA is rescinded. Those programs fill a critical need for qualified health care personnel, such as nursing or one of the 12 allied health programs only offered in Delaware at DTCC.

14. Finally, a fear of deportation could prevent DACA recipients from commencing or continuing their education if DACA is rescinded.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed this 22<sup>nd</sup> day of September, 2017.

  
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Melissa L. Rakes, Ed.D.  
Associate Vice President for Academic Affairs